

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

FREE SPEECH COALITION, INC, et.  
al.,  
*Plaintiffs,*

v.

ANGELA COLMENERO, in her  
official capacity as Interim Attorney  
General for the State of Texas,  
*Defendant.*

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Civil Action No. 1:23-cv-00917-DAE

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**DECLARATION OF ERIK CABRERA**

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1. I am over the age of 18 and have personal knowledge of the facts set forth in this Declaration.
2. I am a Sergeant in the Child Exploitation Unit of the Criminal Investigations Division in the Office of the Texas Attorney General where I have been employed for 9 years. Prior to that, I spent 6 years as a law enforcement officer with Uvalde County Sheriff's Department.
3. As part of my job with the Texas OAG, I conduct investigations involving the online sexual exploitation of children. I have to visit porn websites on a daily basis.
4. After reading paragraph 41 of the declaration of Richard L. Sonnier, I recreated the scenario he presents there. I went to Bing.com. I turned off safe search filters and searched "hot sex." The first page of results was exclusively links to Pornhub.com and XNXX.com. Images were blurred even though I had turned off "safe search."
5. When I clicked on the "videos" tab, the vast majority of results—almost all—were for Pornhub.com, XNXX.com, xhamster.com, and xvideos.com.
6. On the main tab for all results, I clicked the first link, which directed me to XNXX.com.



7. Among other things the landing page of XNXX.com shows still shots of porn videos, 6 images across the screen and about 6 rows down. In total, about 36 still shots of porn videos. When I moved my mouse over an image, scenes from the video begin to play even if I did not click on the image.

8. Below each of the images was a title for the video. Titles on the landing page of XNXX.com included, “18yo chubby teen Alba gets her first cock up her tight ass,” “Ebony Little Step Sister Cums On Step Brother’s Cock,” and “White Whore Fucks Biggest Black Cocks Ever.”

9. XNXX.com links to various categories of videos called “Tags” on their site. There are thousands of tags available. They include “balls deep anal” (200,311 results), “family porn” (196,887), “gaping asshole” (44,380), “perfect girl porn” (306,230), “teen hardcore” (579,497), and “young petite porn” (328,273).

10. I also searched the word “bondage” in the search bar and the search bar indicated that 49,461 videos matched that tag. But it also showed that 257,987 videos matched “teen bondage.” Other apparently popular categories of bondage videos include “bondage anal” (199,003), “anal bondage” (198,984), “Asian bondage” (88,713), “Japanese Bondage” (67,340), and “ebony bondage” (91,203).

11. I typed in “teen bondage” in the search bar and the site provided the top auto-fill option as “teen bondage gangbang.” I initiated that search and it returned 304,523 free videos in response with additional 18,346 available through XNXX.com Gold

12. I clicked to watch a video titled, “Using and a. the whore.” In that 36-minute video, 5 men tie up a woman with electrical tape and rope. Throughout the video, they take turns penetrating her orally, vaginally, and anally, sometimes simultaneously. At one point, a man puts his hands around her neck. The men also slap her repeatedly. While she is still tied up, the men later strap a device around her head called a “mouth spreader” or “spider mouth gag” that forces her mouth to remain open. They then take turns ejaculating into her mouth. This video had approximately 671,000 views and a

98 percent rating. During my time on XNXX.com, I came across other videos that I would prefer not to describe in this declaration.

13. I also clicked on a link to XNXX “Gold.” This portal within the website offers access to “Exclusive Content.” When I clicked the link to sign up, it took me to [xnxx.gold/account/create](https://xnxx.gold/account/create) which advertised “XNXX GOLD originals.” It also showed a picture of a man dressed in all black, with black gloves, a black handkerchief over his face, covering the mouth of a naked woman whom he appeared to be taking by surprise. The website Pornhub.com had a similar scheme where I could click to get original content.

14. I also visited the website Pornhub.com. It has the same general layout as xnxx.com, which is a common layout for porn sites, where the landing pages show photos that you can click on to view videos. Or, you can scroll over the pictures to see a preview without clicking. Among the many channels on Pornhub.com, is a channel for Pornhub Originals which indicates Pornhub itself produces content for the site and has been doing so for about 6 years. Pornhub also has a blog.

15. Pornhub provides a “Year In Review” where it analyzes the data Pornhub collects about its visitors. One chart shows how much time each state’s residents spent on Pornhub per visit, down to the second. Pornhub also identifies the most popular search terms per state.

16. On their site, Pornhub also represents that in 2019 it had 42 billion visitors, 115 million visitors per day, and 6.83 million new video uploads that constituted 1.36 million hours of new content, which, Pornhub calculates as 169 years. And the site states, “If you started watching 2019’s new videos in 1850, you would still be watching them today.”

17. I also visited the websites Letsdoeit.com, Superbe.com, MYLF.com, and TeamSkeet.com. The landing pages of those websites likewise show pictures of videos that you can click on to view. However, you can only view short previews, and if you click on the videos, you are taken immediately to a screen that requests payment.

18. Even for the non-subscription websites, the videos posted on the channel often act as advertisements for other porn channels. Sometimes those content creators provide free full-length videos that provide a link to the channel or content creator that posted the video. Other times the videos will include a watermark that advertises the content creator. And when you click on a video, an ad usually plays first.

19. The sites' pages are also filled with advertisements along the top banner and/or sidebars. Those ads sometimes promote other porn sites by showing a porn video that leads to another porn site. The ads may also show male or female genitalia being stimulated by an advertised sex toy. The product or purpose of the ads varies, but they are always, or almost always, themselves pornographic.

**DECLARATION UNDER PENALTY OF PERJURY**

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the above statements are true and based upon my personal knowledge.

/s/   
Sgt. Erik Cabrera